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Brain Synergy Institute, LLC, KBCR, LLC and
Carrick Brain Centers

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

LIFE UNIVERSITY, INC.)	
)	
Plaintiff,)	Case No. 1:13-cv-0174-SCJ
)	
v.)	DECLARATION OF
)	KENNETH C. BEAM IN
BRAIN SYNERGY INSTITUTE, LLC,)	SUPPORT OF DEFENDANTS'
KBCR, LLC and CARRICK BRAIN)	REPLY IN SUPPORT OF
CENTERS,)	THEIR MOTION TO DISMISS
)	FOR LACK OF PERSONAL
Defendants.)	JURISDICTION

I, Kenneth C. Beam, declare as follows:

1. I am President of Brain Synergy Institute, LLC, d/b/a Carrick Brain Centers ("BSI"), the Defendant in this case.

2. I submit this Declaration in support of Defendants' Reply in Support of Their Motion to Dismiss for Lack of Personal Jurisdiction.

3. BSI operates an Internet website at www.carrickbraincenters.com, which describes our services. The website is edited from time to time.

4. On May 25, 2013, after Life U filed its Complaint in this matter, the marketing company that we hired to manage our website changed the website in several respects, which included adding the address for the future location of BSI's wholly-owned subsidiary, Carrick Brain Centers of Atlanta, LLC ("CBC Atlanta"), in Marietta, Georgia. This was the first time the Marietta location was mentioned on the website.

5. The reference to our subsidiary's Marietta location was subsequently removed from the website because we felt it suggested that the Marietta location was open and operational, which was not the case.

6. On July 29, 2013, the Marietta location opened and began providing services to patients. At that time, the reference to the Marietta location was added back to the website.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 22nd day of August, 2013.

A handwritten signature in black ink, appearing to read 'KCB', is written over a horizontal line.

Kenneth C. Beam